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10	Attorneys for Plaintiffs Indiezone, Inc. and eob	Buy Licensing Ltd.
11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA SAN FRANSICO DIVISION	
13	Indiezone, Inc., a Delaware corporation, and	
14	EoBuy, Limited an Irish private limited company,	G N 2.12 0.1200 NG
15	Plaintiffs,	Case No: 3:13-cv-04280 VC
16	vs.	
17	Todd Rooke, Joe Rogness, Phil Hazel, Sam	DECLARATION OF DOUGLAS R. DOLLINGER IN SUPPORT OF
18	Ashkar, Holly Oliver and U.S. Bank, collectively the <i>RICO Defendants</i> ;	PLAINTIFFS' OPPOSED MOTION FOR AN ENLARGEMENT OF TIME TO
19	Jingit LLC, Jingit Holdings, LLC, Jingit	REPLY TO DEFENDANTS' RESPONSE TO MOTION TO AMEND COMPLAINT
20	Financial Services LLC., Music.Me, LLC., Tony Abena, John E. Fleming, Dan Frawley,	AND DEFENDANTS' RESPONSE TO MOTION REQUESTING AN
21	Dave Moorehouse II, Chris Ohlsen, Justin	ENLARGEMENT OF TIME TO SUBMIT A CORRECTED RESPONSE TO THE
22	James, Shannon Davis, Chris Karls in their capacities as officers, agents and/or	DEFENDANTS' MOTIONS TO COMPEL ARBITRATION, DISMISS OR STAY
23	employees of Jingit LLC, <i>Defendants in</i> Negligence, and Aiding/Abetting;	THE PROCEEDINGS PURSUANT TO CIVIL LOCAL RULES 6-3.
24		
25	Wal-Mart, General Electric, Target, DOE(s) and ROE(s) 1 through 10, <i>Defendants in</i>	Courtroom: 4, 17 th Floor District Judge Vince Chhabria
26	Negligence Secondary-Vicarious Infringement,	
27	Defendants.	
28		

I, DOUGLAS R. DOLLINGER, ESQ., admitted to practice pro hac vice in the United States District Court of Northern District of California San Francisco Division, declare under the penalty of perjury the following:

- 1. On April 23, 2014, Defendants filed five Responses to Plaintiffs' Motion to Amend Complaint and Plaintiffs' Motion Requesting an Enlargement of Time to Submit a Corrected Response to the Defendants' Motions to Compel Arbitration, Dismiss or Stay the Proceedings. [DE 94, DE 97, DE 98, DE 99, DE 100].
- 2. Defendants Responses included a Declaration from Brian Walker, a Barrister-of-Law in Ireland, who made a number of statements referencing numerous documents attached to his declaration. [DE 95, Exhibits A-L].
- 3. In order for Plaintiffs to reply to Defendants responses, Plaintiffs are required to investigate the assertions made by Mr. Walker and the documents submitted in support of those assertions. This can only be accomplished through contact with officials in Ireland and Plaintiffs' investigation is hindered by the different hours of operation of businesses in different time zones.
- 4. In anticipation of this burden, on April 28, 2014, Plaintiffs' contacted Defendants' counsel requesting a stipulation to enlarge time to respond but that request was denied.
- 5. Plaintiffs' now seek the Court's permission to enlarge time to reply to Defendants' responses to May 7, 2014. Because this is a reply it will not affect any filing deadlines for the Defendants nor change the scheduled hearing date of June 5, 2014. Defendants would therefore not be prejudiced by the enlargement of time.

Dated: April 30, 2014

LAW OFFICES OF DOUGLAS R. DOLLINGER

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